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Attorneys for Defendant:
JOSE JESUS MADRIGAL-DIAZ

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

V.

JOSE JESUS MADRIGAL-DIAZ,

Defendant.

Case No. CR 07-0309 WHA

**DEFENDANT'S RESPONSE
TO UNITED STATES
MOTIONS *IN LIMINE***

Trial Date: October 1, 2007
Time: 7:30am

I. RESPONSE TO STATEMENT OF FACTS AND PROCEDURAL HISTORY

Defendant objects to the admission of any evidence regarding an arrest of Defendant for violation of Title 8, United States Code, Section 1324 (a) (1) (A) ii (Transportation of Aliens).

Fed. R. Evid 402, 403

II. RESPONSE TO MOTIONS IN LIMINE (A through J)

(A) Defendant objects to the admission of Defendant's prior statements.

Fed. R. Evid 402, 403, 802

(B) Defendant objects to the admission of Defendant's illegal entry convictions.

Fed. R. Evid 402, 403, 802

(C) Defendant objects to the admission of Defendant's prior convictions.

Fed. R. Evid 402, 403

(D) Defendant objects to the admission of A-File Documents as Self-Authenticating Public Records.

Fed. R. Evid 802

(E) Defendant objects to the admission of a Certificate of Non-Existence as the Absence of a Public Record.

Fed. R. Evid 402, 403

(F) Defendant objects to any testimony by the Fingerprint Expert regarding a previous deportation of Defendant.

Fed. R. Evid 702

1 (G) Defendant does not intend to testify at the present time.

2 (H) Defendant does not intend to testify at the present time

3 (I) Defendant does not intend to testify at the present time.

4 (J) Defendant does not intend to testify at the present time

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13 DATED: September 19, 2007

Respectfully Submitted,

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17 /s/
JEFFRY GLENN
Attorney for Defendant
Jose Jesus Madrigal-Diaz
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